

ESTTA Tracking number: **ESTTA184650**

Filing date: **01/04/2008**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91159866
Party	Defendant SAN MIGUEL CORPORATION
Correspondence Address	ELLIOTT C. BANKENDORF WELSH & KATZ, LTD. 120 SOUTH RIVERSIDE PLAZA, 22ND FLOOR CHICAGO, IL 60606 UNITED STATES ecbankendorf@welshkatz.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Elliott C. Bankendorf
Filer's e-mail	ecbdocket@welshkatz.com
Signature	/ecb/
Date	01/04/2008
Attachments	motion to extend-01042008-031045PM.pdf (3 pages)(106112 bytes)

In the Matter of Application Serial No. 76/151,605
Filed: October 19, 2000
For the mark CALI 10
Published in the *Official Gazette* on November 12, 2002

Applicant.

)
)
)
)
)
)
) Opposition No. 91159866
)
)
)
)
)
)
)
)
)

On December 6, 2007, Opposer sent via First Class Mail the aforementioned discovery requests. Applicant's attorneys have received said requests and hereby respectfully request an extension of time to respond for the reasons set forth herein. The application at issue was filed on October 19, 2000. Thus, the matter has been dormant for some time. The records pertaining to Opposer's discovery requests are old; and Applicant will likely require additional time to locate the requested information. Furthermore, there are substantial delays in receiving

documents from Applicant due to Applicant's location in the Philippines. Additional time is necessary to locate and ship the requested documents and things. Without additional time to respond, there will be considerable delays in Applicant's responses to Opposer's discovery requests.

Delays will inevitably result in incomplete responses to Opposer's discovery requests. Moreover, Applicant will have to continually supplement discovery responses leading to an inefficient discovery process and a delayed discovery period. With additional time to adequately collect information and documents, Applicant will be better able to respond to Opposer's discovery requests.

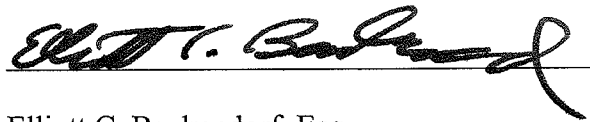
Opposer's counsel has consented to an additional thirty days for Applicant to respond to Opposer's discovery requests. This motion is not for purposes of delay, but rather to ensure efficient and forthcoming discovery responses. It is the best interests of all parties involved for the Trademark Trial and Appeal Board to grant Applicant's request for an additional thirty days to respond to Opposer's discovery requests.

Dated: January 4, 2008

Respectfully Submitted,

On Behalf of Applicant
San Miguel Corporation

By:



Elliott C. Bankendorf, Esq.
Welsh & Katz, Ltd.
120 South Riverside Plaza
Suite 2200
Chicago, Illinois 60606
(312) 655-1500

Attorneys for San Miguel Corporation

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **APPLICANT'S MOTION FOR EXTENSION OF TIME TO REPLY TO OPPOSER'S DISCOVERY REQUESTS** upon Applicant's counsel by depositing a copy thereof in the United States Mail, first-class postage prepaid, on January 4, 2008, addressed as follows:

Bernard R. Gans
Brian W. Kasell
Brian M. Yates
JEFFER, MANGELS, BUTLER & MARMARO LLP
1900 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067


Attorneys for San Miguel Corporation